

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-6977 (GBD)(SN)

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)

**NOTICE OF RULE 60(a) MOTION FOR
CORRECTIONS TO PARTIAL FINAL JUDGMENT**

Plaintiffs as identified in Exhibit 1 to the accompanying Memorandum of Law, by their undersigned counsel, move under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's September 12, 2016 and October 31, 2016 Orders of Partial Final Default Judgments on behalf of certain *Bauer* and *Ashton* Plaintiffs identified in Exhibit A of *Bauer I*, ECF No. 3341, and Exhibits A and B of *Bauer II*, ECF Nos. 3371-1 and 3371-2, for the following reasons:

1. Plaintiffs' counsel conducted extensive quality control before filing its Motions for Partial Final Default Judgments, and has continued its quality control process after filing same, during which time it has continued to obtain additional information from clients and family members of clients to complete its files. In so doing, counsel has determined that certain minor errors were contained in the exhibits identifying certain *Bauer* and *Ashton* Plaintiffs in the above-referenced matter, such as name misspellings, missing initials, suffixes, and name changes.

2. Through the instant Motion, Plaintiffs seek to correct any errors as these issues may create potential problems for Plaintiffs enforcing and collecting of said judgment. None of the modifications requested herein affect the substantive claims or relief sought. No new claims

are asserted, and no additional plaintiffs have been added. Moreover, because the changes are insubstantial, no additional service on Iran is required.

WHEREFORE, Plaintiffs respectfully request the issuance of the Corrected Order of Partial Final Default Judgments on behalf of certain *Bauer* and *Ashton* Plaintiffs as set forth in Exhibit A to this motion.

Dated: January 14, 2020

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

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